

WEIL, GOTSHAL & MANGES LLP

Stephen Karotkin (*pro hac vice*)
(stephen.karotkin@weil.com)
Jessica Liou (*pro hac vice*)
(jessica.liou@weil.com)
Matthew Goren (*pro hac vice*)
(matthew.goren@weil.com)
New York, NY 10153-0119
Tel: (212) 310-8000
Fax: (212) 310-8007

KELLER & BENVENUTTI LLP

Tobias S. Keller (#151445)
(tkeller@kellerbenvenutti.com)
Jane Kim (#298192)
(jkim@kellerbenvenutti.com)
650 California Street, Suite 1900
San Francisco, CA 94108
Tel: (415) 496-6723
Fax: (415) 636-9251

*Proposed Attorneys for Debtors
and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the lead case,
No. 19-30088 (DM)*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**STIPULATION BETWEEN DEBTORS
AND OFFICIAL COMMITTEE OF TORT
CLAIMANTS EXTENDING TIME TO
RESPOND TO MOTIONS TO BE HEARD
ON FEBRUARY 27, 2019**

[No Hearing Requested]

STIPULATION TO EXTEND TIME FOR

1 This stipulation and agreement for order (“Stipulation and Agreement for Order”) is
2 entered into by and between PG&E Corporation (“PG&E Corp.”) and Pacific Gas and Electric
3 Company (the “Utility”), as debtors and debtors in possession (collectively, the “Debtors”) and
4 the Official Committee of Tort Claimants (the “Tort Committee”). The Debtors and the Tort
5 Committee are referred to in this Stipulation and Agreement for Order collectively as the
6 “Parties,” and each as a “Party.” The Parties hereby stipulate and agree as follows:

7 **RECITALS**

8 A. On February 6, 2019, the Debtors filed a notice of hearing [Dkt. 353] noticing
9 sixteen (16) motions listed therein (the “Motions”) for a hearing before the Court at 9:30 a.m. on
10 February 27, 2019.

11 B. Under Local Bankruptcy Rule 9014-1(c)(2), any opposition or response to the
12 Motions must be filed and served on counsel for the Debtors no later than February 20, 2019.

13 C. The U.S. Trustee filed an Appointment of the Official Committee of Tort
14 Claimants on February 15, 2019 [Dkt. 453].

15 D. Proposed Counsel to the Debtors offered to extend the time for the Tort
16 Committee to respond to the Motions by two days, and the proposed Counsel to the Tort
17 Committee agreed to the extension, subject to reserving the Tort Committee’s right to seek a
18 further extension by stipulation with the Debtors or further order of the Court.

19
20 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**
21 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**
22 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE**
23 **UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT TO ORDER,**
24 **THAT:**

25 1. The time for the Tort Committee and to file and serve any response or
26 opposition to the Motions be extended through 4:00 p.m. (Pacific Time) on February 22, 2019.

27 [Signatures on Next Page]
28

1 Dated: February 19, 2019

2 KELLER & BENVENUTTI LLP

3
4 /s/ Tobias S. Keller

Tobias S. Keller

5 *Proposed Attorneys for Debtors*
6 *and Debtors in Possession*

Dated: February 19, 2019

BAKER & HOSTETLER LLP

/s/ Cecily A. Dumas

Cecily A. Dumas

*Proposed Attorneys for Official Committee
of Tort Claimants*